

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:25-CR-00083

MAXIMINO MONTALVO SALAS

GOVERNMENT'S UNOPPOSED MOTION TO CONTINUE  
JOINT PLEA AND SENTENCING HEARING

Comes now the United States of America, by Jonathan T. Storage, Assistant United States Attorney for the Southern District of West Virginia, and respectfully submits this motion to continue the joint plea and sentencing hearing scheduled in this case. In support of its motion, the government states the following.

1. On July 14, 2025, the defendant is scheduled to appear before the Court for a combined plea and sentencing hearing. ECF No. 34.

2. On July 14, 2025, the undersigned attorney for the government is scheduled to be in trial before Judge Irene C. Berger in the case of United States of America v. Kisha Sutton, et al., Case No. 2:24-cr-00192.

3. As of this writing, the government expects that the Sutton trial will proceed as scheduled.

4. The government has communicated with Assistant Federal Public Defender Clint Carte, and the government is authorized to report that the defense does not object to a brief continuance of the joint proceeding in this case.

5. A continuance of one week will not unduly prejudice the defendant and will not unnecessarily prolong the Court's final disposition of this case.

For the reasons stated herein, the government respectfully requests that the Court continue for a period of one week the joint plea and sentencing hearing.

Respectfully submitted,

LISA G. JOHNSTON  
Acting United States Attorney

By:

s/Jonathan T. Storage  
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**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing "GOVERNMENT'S UNOPPOSED MOTION TO CONTINUE JOINT PLEA AND SENTENCING HEARING" has been electronically filed and service has been made on opposing counsel by virtue of electronic mail this the 9th day of July, 2025, to:

Clint Carte, Esq.  
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